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KAHEAL PARRISH

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

KAHEAL PARRISH,

Plaintiff,

v.

A. SOLIS, *et al.*,

Defendants.

CASE NO.: 5:11-cv-01438-LHK

**PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' MOTION *IN LIMINE*  
NO. 4**

Date: November 20, 2014

Time: 1:30 p.m.

Courtroom: 8

Judge: The Honorable Lucy H. Koh

Trial Date: December 5, 2014

Action Filed: March 11, 2011

1 Defendants' Motion *in Limine* No. 4 seeks to exclude all evidence, references to evidence,  
2 testimony or referring to any Defendant or Salinas Valley employee as "assault defendants" or  
3 "non-party co-conspirators." Plaintiff does not intend to use such titles to describe Defendants or  
4 non-parties during trial. But, Plaintiff believes that consistent labels for various groups of  
5 Defendants and non-parties will help prevent jury confusion. Plaintiff will confer with Defendants  
6 prior to the pre-trial hearing to see if the parties can agree upon labels that can be used to describe  
7 such groups of people.

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9  
10 Dated: November 10, 2014

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12 By: /s/ William J. Casey  
13 William Casey  
14 Attorneys for Plaintiff  
15 KAHEAL PARRISH  
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**CERTIFICATE OF SERVICE**

I am employed in the county of Santa Clara, State of California. I am over the age of 18 and not a party to the within action; my business address is 525 University Avenue, Suite 1400, Palo Alto, CA 94301.

On November 10, 2014 I served the foregoing document described as:

**PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION *IN LIMINE* NO. 4**

on the interested parties in this action as follows:

**D. Robert Duncan II, Esq.  
Sharon Garske  
Deputy Attorney General  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004**

☒ (BY EMAIL) I am readily familiar with the firm's practice of email transmission; on this date, I caused the above-referenced document(s) to be transmitted by email as noted above and that the transmission was reported as complete and without error.

☐ (BY MAIL) I am readily familiar with the firm's practice for the collection and processing of correspondence for mailing with the United States Postal Service and the fact that the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business; on this date, the above-referenced correspondence was placed for deposit at Palo Alto, California and placed for collection and mailing following ordinary business practices.

☐ (BY FEDERAL EXPRESS) I am readily familiar with the firm's practice for the daily collection and processing of correspondence for deliveries with the Federal Express delivery service and the fact that the correspondence would be deposited with Federal Express that same day in the ordinary course of business; on this date, the above-referenced document was placed for deposit at Palo Alto, California and placed for collection and delivery following ordinary business practices.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed November 10, 2014 at Palo Alto, California.

\_\_\_\_\_  
/s/ Wayne Campbell  
Wayne Campbell